



SERVICE EMPLOYEES  
INTERNATIONAL UNION  
CLC

**MICHAEL P. FISHMAN**  
President

**KEVIN J. DOYLE**  
Executive Vice President

**HÉCTOR J. FIGUEROA**  
Secretary-Treasurer

**KYLE BRAGG**  
Vice President

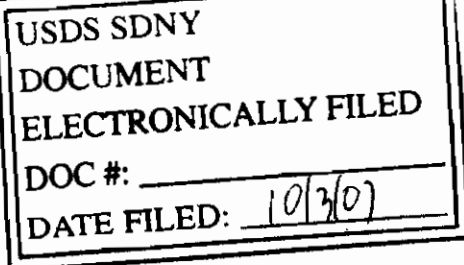
**LENORE FRIEDLAENDER**  
Vice President

**BRIAN LAMBERT**  
Vice President

**VALARIE LONG**  
Vice President

Online at:  
www.seiu32bj.org

**Local 32BJ Headquarters:**  
101 Avenue of the Americas  
New York, NY 10013-1991  
212.388.3800



Writer's Direct Dial: (212) 388-3854

September 25, 2007

**MEMO ENDORSED**

Honorable Richard J. Sullivan  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 615  
New York, New York 10007

**Re: Unithree Investment Corp. v. SEIU, Local 32BJ  
Index No. 07 CV 4788 (RJS)**

Dear Judge Sullivan:

We represent the defendant, Service Employees International Union, Local 32BJ in the referenced action.

By Order dated September 21, 2007 (copy enclosed), Your Honor set a briefing schedule and also set a date for oral argument, if necessary, on defendant's motions. The Order states that the date for oral argument is December 12, 2007; however, at the conference before Your Honor, oral argument was scheduled for December 17, 2007. I have spoken with the plaintiff's counsel, Randy Gidseg, who concurs that oral argument was scheduled for December 17, 2007.

Accordingly, the undersigned respectfully requests that the date for oral argument be changed to December 17, 2007 or some other mutually agreed upon date. Counsel for defendant is unable to attend oral argument on December 12, 2007.

Respectfully submitted,

Judith I. Padow (JIP 1151)  
Assistant General Counsel

JIP:mb  
Enclosure

cc: Randy Gidseg

Office of the General Counsel

**SEIU Local 32BJ**  
101 Avenue of the Americas  
19th Floor  
New York, NY 10013-1906  
Fax: 212.388.2062

SO ORDERED  
Dated: 10/2/07

RICHARD J. SULLIVAN  
U.S.D.J.

*Argument set for December 17, 2007 @ 2:30pm.*